

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,
individually and on behalf of a class of all others
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**DECLARATION OF CLAUDIA WILNER IN SUPPORT OF PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION**

CLAUDIA WILNER declares pursuant to 28 U.S.C. § 1746:

1. I am the Director of Litigation and Advocacy of the National Center for Law and Economic Justice ("NCLEJ"), which serves as counsel to the Plaintiffs in this action together with co-counsel Center for Constitutional Rights ("CCR"), the Western New York Law Center ("WNYLC"), and Covington & Burling LLP ("Covington").
2. I make this declaration in support of Plaintiffs' motion for class certification pursuant to Rule 23 of the Federal Rules of Civil Procedure.
3. I am one of the attorneys for Plaintiffs and the proposed Plaintiff Classes. As such, I am fully familiar with the facts and circumstances of this case. The purpose of this declaration is: (1) to provide the Court with information to establish adequacy of representation under Fed. R. Civ. P. 23(a)(4); and (2) to identify for the Court evidentiary support for Plaintiffs' motion.

I. Adequacy of Representation

4. NCLEJ and its three senior lawyers on this case, myself, Anjana Malhotra, and Edward Krugman, are experienced in the relevant subject area and in class action litigation raising constitutional claims in federal courts. NCLEJ has been in existence for over 50 years and is one of the

pre-eminent national organizations litigating on behalf of low-income people and marginalized communities. NCLEJ has successfully litigated dozens of class actions in federal and state courts over the last 25 years. I have been appointed class counsel in several of those actions, including *Robinson v. New York City Transit Auth.*, No. 19-cv-01404 (S.D.N.Y.); *Alexander v. Miller*, No. 3:20-cv-00044 (E.D. Ky.) (with Mr. Krugman); *Robinson v. Long*, No. 3:17-cv-01263 (M.D. Tenn) (same); *Thomas v. Purkey*, No. 3:17-cv-00005 (M.D. Tenn.) (same); *Sanders v. Houslanger & Assoc.*, No. 17 Civ. 8985 (S.D.N.Y.); and *Sykes v. Mel S. Harris & Assoc.*, No. 09 Civ. 8486 (S.D.N.Y.).

5. CCR is a non-profit legal and educational organization dedicated to advancing and protecting the rights guaranteed by the United States Constitution, federal civil rights law, and international law. Founded in 1966, CCR has extensive experience litigating federal class actions challenging racial profiling by law enforcement, discrimination against racial and ethnic minorities in public and private employment, harsh and unconstitutional treatment of state and federal prisoners, and other modern-day manifestations of racial oppression. Representative cases in which CCR has acted as class counsel include *Floyd v. City of New York*, No. 08-CV-01034 (S.D.N.Y.) (representing Black and Latino New Yorkers successfully challenging New York Police Department's policy of "stop and frisk" in violation of the Fourth and Fourteenth Amendments); *Gulino v. Board of Education of the New York City School Districts*, 96 Civ. 8414 (S.D.N.Y.) (representing Black and Latino candidates for New York City school teacher positions in Title VII challenge to New York City and State teacher certification requirements); *Latino Officers Association v. City of New York*, 99 Civ. 9568 (S.D.N.Y.) (representing minority New York City police officers in Title VII challenge to New York Police Department's officer promotion and disciplinary policies and practices); *Byrd v. Goord*, 00 Civ. 2135 (S.D.N.Y.) (constitutional challenge to New York State prison collect

call telephone system brought on behalf of family members of New York State prison inmates); *Turkmen v. Ashcroft*, 02 CV 2307 (E.D.N.Y.) (representing class of individuals claiming they were unconstitutionally detained after September 11, 2001, in violation of the First, Fourth, Fifth, and Sixth Amendments); *United States and Vulcan Society, Inc. v. City of New York*, 07-CV-2067 (E.D.N.Y.) (representing black firefighter candidates and black firefighter fraternal organization in Title VII and constitutional challenge to racially discriminatory hiring practices of the New York City Fire Department). CCR's work on this matter is supervised by Baher Azmy, CCR's Legal Director.

6. WNYLC is a nonprofit legal services organization in Buffalo, NY. Founded in 1996, WNYLC exists to promote human and civil rights with an overarching vision of racial and economic justice. WNYLC provides legal services to thousands of Western New York residents annually in a variety of areas including consumer debt, housing, and small business formation. WNYLC maintains an active affirmative litigation practice in the areas of consumer protection and civil rights and has served as class counsel in numerous certified class actions in state and federal courts, including *Martin v. Werner*, 06-CV-00094E (W.D.N.Y.) (with NCLEJ); *Kari C. and April M. v. Muller*, 6:09-CV-06367 (W.D.N.Y.); and *McCoy v. Restaino*, 1:13-cv-00711-RJA-HBS (W.D.N.Y.) (with NCLEJ). WNYLC's lead attorney, Matthew Parham, currently serves as class counsel in *Chipego v. Five Star Bank*, No. 02466, May Term, 2017, Ct. of Com. Pleas, Philadelphia County, Pennsylvania (class action on behalf of auto loan borrowers challenging unlawful practices surrounding repossession and disposition of financed vehicles).

7. Covington, an international law firm with more than 1,300 lawyers in fourteen offices, serves as co-counsel to Plaintiffs in this case. Covington has extensive experience litigating civil rights cases and class action lawsuits. In its more than 100 years of existence, Covington has built

a reputation for its commitment to pro bono work, being recognized as the Pro Bono Law Firm of the Year in 2021 and 2023 by The American Lawyer and in 2021 by the D.C. Bar, to name a few of many accolades.

8. Representative civil rights cases in which Covington has acted as class counsel include: *Floyd v. City of New York*, No. 08-CV-01034 (S.D.N.Y.) (landmark civil rights litigation alleging violations of the Fourth and Fourteenth Amendments based on NYPD's "stop and frisk" policies and practices); *Melendres v. Arpaio*, No. 07-CV-02513 (D. Ariz.) (representing a class of Latino individuals against a county sheriff's office alleging racial profiling and discrimination in violation of the Fourth and Fourteenth Amendments); *Thorpe v. Virginia Dep't of Corr.*, No. 20-CV-00007 (W.D. Va.) (representing class of inmates in Virginia prisons challenging solitary confinement practices); *Dockery v. Cain*, No. 13-cv-326 (S.D. Miss.) (representing class of inmates in East Mississippi Correctional Facility challenging conditions of confinement); *Mathis v. Geo Group, Inc.*, No. 2:08-CT-00021-H (E.D.N.C.) (representing prisoners incarcerated at a privately-operated prison alleging deficient medical care in violation of the Eighth Amendment); *Turkmen v. Ashcroft*, No. 1:02-CV-02307 (E.D.N.Y.) (representing class of individuals claiming they were unconstitutionally detained after September 11, 2001, in violation of the First, Fourth, Fifth, and Sixth Amendments). Covington's work on this matter is supervised by Philip Irwin, a partner in the firm. Mr. Irwin served as class counsel in *Floyd*.

9. The Individual Plaintiffs have vigorously represented the interests of the Classes. Each Plaintiff has provided information to counsel, responded to discovery requests from defendants, sat for deposition, and has discussed with counsel what they think a fair resolution would be. Plaintiffs understand their duties as Class representatives and are committed to fulfilling their obligations to the Classes they seek to represent.

II. Evidentiary Support

10. Attached as **Exhibit 1** is a true and correct copy of the Expert Report of Professor David Bjerk served on May 29, 2024.
11. Attached as **Exhibit 2** is a true and correct copy of the Expert Report of Professor Michael Gennaco served on May 29, 2024.^f
12. Attached as **Exhibit 3** is a true and correct copy of the Expert Report of Professor Robert Silverman served on May 29, 2024.
13. Attached as **Exhibit 4** is a true and correct copy of excerpts of the transcript from the deposition of Michael Acquino.
14. Attached as **Exhibit 5** is a true and correct copy of excerpts of the transcript from the deposition of the City of Buffalo's Rule 30(b)(6) designee Derrick Banaszak.
15. Attached as **Exhibit 6** is a true and correct copy of excerpts of the transcript from the deposition of Kevin Brinkworth.
16. Attached as **Exhibit 7** is a true and correct copy of excerpts of the transcript from the deposition of Mayor Byron Brown.
17. Attached as **Exhibit 8** is a true and correct copy of excerpts of the transcript from the deposition of Daniel Derenda.
18. Attached as **Exhibit 9** is a true and correct copy of excerpts of the transcript from the deposition of the City of Buffalo's Rule 30(b)(6) designee Daniel Derenda.
19. Attached as **Exhibit 10** is a true and correct copy of excerpts of the transcript from the deposition of Jared Domaracki.
20. Attached as **Exhibit 11** is a true and correct copy of excerpts of the transcript from the deposition of Donna Estrich.

21. Attached as **Exhibit 12** is a true and correct copy of excerpts of the transcript from the deposition of Dortha Franklin.
22. Attached as **Exhibit 13** is a true and correct copy of excerpts of the transcript from the deposition of Joseph Gramaglia.
23. Attached as **Exhibit 14** is a true and correct copy of excerpts of the transcript from the deposition of the City of Buffalo's Rule 30(b)(6) designee Joseph Gramaglia.
24. **Exhibit 15** is intentionally left blank.
25. Attached as **Exhibit 16** is a true and correct copy of excerpts of the transcript from the deposition of Michael J. Healy.
26. Attached as **Exhibit 17** is a true and correct copy of excerpts of the transcript from the deposition of Kevin Helfer.
27. Attached as **Exhibit 18** is a true and correct copy of excerpts of the transcript from the deposition of Richard Hy.
28. Attached as **Exhibit 19** is a true and correct copy of excerpts of the transcript from the deposition of Byron Lockwood.
29. Attached as **Exhibit 20** is a true and correct copy of excerpts of the transcript from the deposition of Harold McLellan.
30. Attached as **Exhibit 21** is a true and correct copy of excerpts of the transcript from the deposition of Charles Miller.
31. Attached as **Exhibit 22** is a true and correct copy of excerpts of the transcript from the deposition of Danielle Morgera.
32. Attached as **Exhibit 23** is a true and correct copy of excerpts of the transcript from the deposition of the City of Buffalo's Rule 30(b)(6) designee of Patrick Overdorf.

33. Attached as **Exhibit 24** is a true and correct copy of excerpts of the transcript from the deposition of Michael Quinn.
34. Attached as **Exhibit 25** is a true and correct copy of excerpts of the transcript from the deposition of Patrick Roberts.
35. Attached as **Exhibit 26** is a true and correct copy of excerpts of the transcript from the deposition of Rob Rosenwie.
36. Attached as **Exhibit 27** is a true and correct copy of excerpts of the transcript from the deposition of Lance Russo.
37. Attached as **Exhibit 28** is a true and correct copy of excerpts of the transcript from the deposition of Philip Serafini.
38. **Exhibit 29** is intentionally left blank.
39. Attached as **Exhibit 30** is a true and correct copy of excerpts of the transcript from the deposition of Charles Skipper.
40. Attached as **Exhibit 31** is a true and correct copy of excerpts of the transcript from the deposition of Justin Tedesco.
41. Attached as **Exhibit 32** is a true and correct copy of excerpts of the transcript from the deposition of Robbin Thomas.
42. Attached as **Exhibit 33** is a true and correct copy of excerpts of the transcript from the deposition of Thomas Whelan.
43. Attached as **Exhibit 34** is a true and correct copy of excerpts of the transcript from the deposition of Adam Wigdorski.
44. Attached as **Exhibit 35** is a true and correct copy of excerpts of the transcript from the deposition of David Wilcox.

45. Attached as **Exhibit 36** is a true and correct copy of excerpts of the transcript from the deposition of Aaron Young.

46. Attached as **Exhibit 37** is a true and correct copy of Exhibit 1 to the deposition of Daniel Derenda.

47. Attached as **Exhibit 38** is a true and correct copy of Exhibit 2 to the deposition of Daniel Derenda.

48. Attached as **Exhibit 39** is a true and correct copy of Exhibit 4 to the deposition of Daniel Derenda.

49. Attached as **Exhibit 40** is a true and correct copy of Exhibit 8 to the deposition of Daniel Derenda.

50. Attached as **Exhibit 41** is a true and correct copy of Exhibit 12 to the deposition of Daniel Derenda.

51. Attached as **Exhibit 42** is a true and correct copy of Exhibit 15 to the deposition of Daniel Derenda.

52. Attached as **Exhibit 43** is a true and correct copy of Exhibit 17 to the deposition of Daniel Derenda.

53. Attached as **Exhibit 44** is a true and correct copy of Exhibit 18 to the deposition of Daniel Derenda.

54. Attached as **Exhibit 45** is a true and correct copy of Exhibit 31 to the deposition of Daniel Derenda.

55. Attached as **Exhibit 46** is a true and correct copy of Exhibit 32 to the deposition of Daniel Derenda.

56. Attached as **Exhibit 47** is a true and correct copy of Exhibit 40 to the deposition of Daniel Derenda.

57. Attached as **Exhibit 48** is a true and correct copy of Exhibit 41 to the deposition of Daniel Derenda.

58. Attached as **Exhibit 49** is a true and correct copy of Exhibit 47 to the deposition of Daniel Derenda.

59. Attached as **Exhibit 50** is a true and correct copy of Exhibit 58 to the deposition of Daniel Derenda.

60. Attached as **Exhibit 51** is a true and correct copy of Exhibit 59 to the deposition of Daniel Derenda.

61. Attached as **Exhibit 52** is a true and correct copy of Exhibit 61 to the deposition of Daniel Derenda.

62. Attached as **Exhibit 53** is a true and correct copy of Exhibit 3 to the deposition of Donna Estrich.

63. Attached as **Exhibit 54** is a true and correct copy of Exhibit 18 to the deposition of Donna Estrich.

64. Attached as **Exhibit 55** is a true and correct copy of Exhibit 17 to the deposition of John Evans.

65. Attached as **Exhibit 56** is a true and correct copy of Exhibit 16 to the deposition of Kevin Helfer.

66. Attached as **Exhibit 57** is a true and correct copy of Exhibit 7 to the deposition of Byron Lockwood.

67. Attached as **Exhibit 58** is a true and correct copy of Exhibit 9 to the deposition of Byron Lockwood.

68. Attached as **Exhibit 59** is a true and correct copy of Exhibit 10 to the deposition of Byron Lockwood.

69. Attached as **Exhibit 60** is a true and correct copy of Exhibit 13 to the deposition of Byron Lockwood.

70. Attached as **Exhibit 61** is a true and correct copy of Exhibit 14 to the deposition of Byron Lockwood.

71. Attached as **Exhibit 62** is a true and correct copy of Exhibit 21 to the deposition of Byron Lockwood.

72. Attached as **Exhibit 63** is a true and correct copy of Exhibit 22 to the deposition of Byron Lockwood.

73. Attached as **Exhibit 64** is a true and correct copy of Exhibit 23 to the deposition of Byron Lockwood.

74. Attached as **Exhibit 65** is a true and correct copy of Exhibit 25 to the deposition of Byron Lockwood.

75. Attached as **Exhibit 66** is a true and correct copy of Exhibit 26 to the deposition of Byron Lockwood.

76. Attached as **Exhibit 67** is a true and correct copy of Exhibit 36 to the deposition of Byron Lockwood.

77. Attached as **Exhibit 68** is a true and correct copy of Exhibit 11 to the deposition of Patrick Roberts.

78. Attached as **Exhibit 69** is a true and correct copy of Exhibit 11 to the deposition of Philip Serafini.
79. Attached as **Exhibit 70** is a true and correct copy of Exhibit 12 to the deposition of Aaron Young.
80. Attached as **Exhibit 71** is a true and correct copy of the City of Buffalo Traffic Violations Agency 2017 Annual Report.
81. Attached as **Exhibit 72** is a true and correct copy of the City of Buffalo Traffic Violations Agency 2018 Annual Report.
82. Attached as **Exhibit 73** is a true and correct copy of the City of Buffalo Traffic Violations Agency 2019 Annual Report.
83. Attached as **Exhibit 74** is a true and correct copy of the document produced as PLAINTIFFS_GENERIC-00001309.
84. Attached as **Exhibit 75** is a true and correct copy of the City of Buffalo Police Department Adopted Budget for Fiscal Year 2016-2017.
85. Attached as **Exhibit 76** is a true and correct copy of the City of Buffalo General Fund Adopted Budget Summary of Department Revenue by Source for Fiscal Year 2015-2016.
86. Attached as **Exhibit 77** is a true and correct copy of the City of Buffalo Executive Department Adopted Budget for Fiscal Year 2017.
87. Attached as **Exhibit 78** is a true and correct copy of the City of Buffalo Police Department Adopted Budget for Fiscal Year 2017-2018.
88. Attached as **Exhibit 79** is a true and correct copy of General Order No. 2020-015 – Body Worn Camera Program.

89. Attached as **Exhibit 80** is a true and correct copy of the document produced as COB_INC_00000107.

90. Attached as **Exhibit 81** is a true and correct copy of the document produced as COB016263.

91. Attached as **Exhibit 82** is a true and correct copy of the document produced as COB018325.

92. Attached as **Exhibit 83** is a true and correct copy of the document produced as COB027576.

93. Attached as **Exhibit 84** is a true and correct copy of the document produced as COB041694.

94. Attached as **Exhibit 85** is a true and correct copy of the document produced as COB044624.

95. Attached as **Exhibit 86** is a true and correct copy of the document produced as COB044629.

96. Attached as **Exhibit 87** is a true and correct copy of the document produced as COB044630.

97. Attached as **Exhibit 88** is a true and correct copy of the document produced as COB052633.

98. Attached as **Exhibit 89** is a true and correct copy of the document produced as COB053722.

99. Attached as **Exhibit 90** is a true and correct copy of the document produced as COB056235.

100. Attached as **Exhibit 91** is a true and correct copy of the document produced as COB056249.

101. Attached as **Exhibit 92** is a true and correct copy of the document produced as COB067696.

102. Attached as **Exhibit 93** is a true and correct copy of the document produced as COB067730.

103. Attached as **Exhibit 94** is a true and correct copy of the document produced as COB067747.

104. Attached as **Exhibit 95** is a true and correct copy of the document produced as COB075236.

105. Attached as **Exhibit 96** is a true and correct copy of the document produced as COB075237.

106. Attached as **Exhibit 97** is a true and correct copy of the document produced as COB075238.

107. Attached as **Exhibit 98** is a true and correct copy of the document produced as COB080844.

108. Attached as **Exhibit 99** is a true and correct copy of the document produced as COB091747.

109. Attached as **Exhibit 100** is a true and correct copy of the document produced as COB093194.

110. Attached as **Exhibit 101** is a true and correct copy of the document produced as COB094070.

111. Attached as **Exhibit 102** is a true and correct copy of the document produced as COB094495.

112. Attached as **Exhibit 103** is a true and correct copy of the document produced as COB094962.

113. Attached as **Exhibit 104** is a true and correct copy of the document produced as COB094964.

114. Attached as **Exhibit 105** is a true and correct copy of the document produced as COB114659.

115. Attached as **Exhibit 106** is a true and correct copy of the document produced as COB116509.

116. Attached as **Exhibit 107** is a true and correct copy of the document produced as COB116794.

117. Attached as **Exhibit 108** is a true and correct copy of the document produced as COB116858.

118. Attached as **Exhibit 109** is a true and correct copy of the document produced as COB120438.

119. Attached as **Exhibit 110** is a true and correct copy of the document produced as COB220344.

120. Attached as **Exhibit 111** is a true and correct copy of the document produced as COB222550.

121. Attached as **Exhibit 112** is a true and correct copy of the document produced as COB226141.

122. Attached as **Exhibit 113** is a true and correct copy of the document produced as COB226142.

123. Attached as **Exhibit 114** is a true and correct copy of the document produced as COB230543.

124. Attached as **Exhibit 115** is a true and correct copy of the document produced as COB230548.

125. Attached as **Exhibit 116** is a true and correct copy of the document produced as COB231059.

126. Attached as **Exhibit 117** is a true and correct copy of the document produced as COB233607.

127. Attached as **Exhibit 118** is a true and correct copy of the document produced as COB246558.

128. Attached as **Exhibit 119** is a true and correct copy of the document produced as COB261985.

129. Attached as **Exhibit 120** is a true and correct copy of the document produced as COB263090.

130. Attached as **Exhibit 121** is a true and correct copy of the document produced as COB264510.

131. Attached as **Exhibit 122** is a true and correct copy of the document produced as COB042018.

132. Attached as **Exhibit 123** is a true and correct copy of Defendants' Amended Responses to Plaintiff's Fifth Set of Interrogatories and Sixth Request for Production of Documents.

133. Attached as **Exhibit 124** is a true and correct copy of City of Buffalo Department of Police General Order 2021-009 dated May 4, 2021.
134. Attached as **Exhibit 125** is a true and correct copy of the Manual of Procedures.
135. Attached as **Exhibit 126** is a true and correct copy of Certification of Domestic Records of Regularly Conducted Activity.
136. Attached as **Exhibit 127** is a true and correct copy of Defendants' Amended Response to Plaintiff's First Set of Requests for Admission.
137. Attached as **Exhibit 128** is a true and correct copy of the document produced as COB029724-COB029725 and COB029730-COB029731.
138. Attached as **Exhibit 129** is a true and correct copy of the parties' Stipulation of Fact Regarding City Traffic Data and Records.
139. Attached as **Exhibit 130** is a true and correct copy of General Order No. 2018-001 Elimination of Strike Force.
140. Attached as **Exhibit 131** is a true and correct copy of the City of Buffalo General Fund Adopted Budget Appropriation Summary by Department for Fiscal Year 2013-2014.
141. Attached as **Exhibit 132** is a true and correct copy of the City of Buffalo General Fund Adopted Budget Revenue by Source for Fiscal Year 2016-2017.
142. Attached as **Exhibit 133** is a true and correct copy of the City of Buffalo General Fund Adopted Budget Summary of Department Revenue by Source for Fiscal Year 2018-2019.
143. Attached as **Exhibit 134** is an article entitled "Are Buffalo Police Check Points Targeting the East Side" published June 23, 2017, from the website located at <https://spectrumlocal-news.com/nys/central-ny/news/2017/06/22/buffalo--east-side--dorethea-franklin--byron-brown-->

mayor--tania-simmons--mark-schroeder--betty-jean-grant--traffic--check-points--tickets--police.

144. Attached as **Exhibit 135** is an article entitled “Buffalo Common Council president calling for greater transparency about traffic stops” published August 1, 2017, from the website located at <https://www.wivb.com/news/buffalo-common-council-president-calling-for-greater-transparency-about-traffic-stops/>.

145. Attached as **Exhibit 136** is an article entitled “Buffalo Mayor answers questions about traffic checkpoints” published July 28, 2017, from the website located at <https://www.wgrz.com/article/news/local/buffalo-mayor-answers-questions-about-traffic-checkpoints/71-460311897>.

146. Attached as **Exhibit 137** is an article entitled “Getting answers about BPD checkpoints” published July 25, 2017, from the website located at <https://www.wgrz.com/article/news/getting-answers-about-bpd-checkpoints/71-459552430>.

147. Attached as **Exhibit 138** is an article entitled “Buffalo’s most issued traffic ticket is for tinted windows” published May 13, 2019, from the website located at https://buffalonews.com/news/local/buffalos-most-issued-traffic-ticket-is-for-tinted-windows/article_8f442207-b43f-5d62-bc3b-def1ac2cc2e6.html.

148. Attached as **Exhibit 139** is a true and correct copy of the City of Buffalo General Fund Adopted Budget Appropriation Summary for Fiscal Year 2016-2017.

149. Attached as **Exhibit 140** is a true and correct copy of Plaintiffs’ Deposition Designations for the Rule 30(b)(6) of the City of Buffalo, Topics 17, 18, 25, 26, 27, 28.

150. Attached as **Exhibit 141** is a true and correct copy of Proceedings of the City of Buffalo June 2, 2015, Special Session at 2:30 pm.

151. Attached as **Exhibit 142** is a true and correct copy of Exhibit 33 to the deposition of Kevin Helfer.

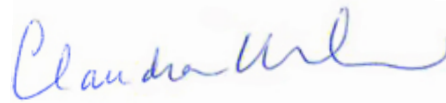
152. Attached as **Exhibit 143** is a true and correct copy of the deposition of Charles Palmer.

153. Attached as **Exhibit 144** is a true and correct copy of the deposition of Ebony Yeldon.

154. Attached as **Exhibit 145** is a true and correct copy of Exhibit 45 to the deposition of the City of Buffalo's Rule 30(b)(6) designee Patrick Overdorf.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: May 29, 2024



Claudia Wilner